

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Cynthia Thomas,

C.A. No. 4:13-cv-00990-BHH

Plaintiff,

v.

Dillon School District Four, D. Ray Rogers,
Arthur McMillan, and Polly Elkins,

Defendants.

VERDICT FORM

Do you find from a preponderance of the evidence:

WAGE DISPARITY CLAIM

1. That Plaintiff Cynthia Thomas was paid less than similarly-situated District employees?

Answer: Yes or No _____

2. If the Answer to Question 1 is "Yes," do you find that Cynthia Thomas' lesser pay was motivated by her race?

Answer: Yes or No _____

Note: If you answered "Yes" to both Questions 1 and 2, do you find:

3. That Plaintiff Cynthia Thomas should be awarded damages to compensate her for the difference in her wages from July 1, 2011 through the date of trial?

Answer: Yes or No _____

If your Answer to Question 3 is "Yes" in what amount do you advise that she be compensated for the difference in her wages? _____

4. That Plaintiff Cynthia Thomas should be awarded damages other than lost wages to compensate her for mental anguish and emotional pain?

Answer: Yes or No _____

If your Answer to Question 4 is "Yes" in what amount? _____

TERMINATION BASED ON RACE CLAIM

1. That Plaintiff Cynthia Thomas' termination by the District was motivated by her race?

Answer: Yes or No _____

Note: If you answered "Yes" to Question 1, do you find:

- 2 That Plaintiff Cynthia Thomas should be awarded damages to compensate her for her lost wages and benefits from the date of her termination through the date of trial?

Answer: Yes or No _____

If your Answer to Question 2 is "Yes" in what amount do you advise that she be compensated for her lost wages and benefits ? _____

- 3 That Plaintiff Cynthia Thomas should be awarded damages other than lost wages and benefits related to her termination?

Answer: Yes or No _____

If your Answer to Question 3 is "Yes" in what amount? _____

RETALIATION CLAIM

1. That Plaintiff Cynthia Thomas was terminated by the District because she made complaints about racial discrimination and pay disparity based on race?

Answer: Yes or No _____

Note: If you answered "Yes" to Question 1, do you find:

2. That Plaintiff Cynthia Thomas should be awarded damages to compensate her for her lost wages and benefits from the date of her termination through the date of trial?

Answer: Yes or No _____

If your Answer to Question 2 is "Yes" in what amount do you advise that she be compensated for her lost wages and benefits? _____

3. That Plaintiff Cynthia Thomas should be awarded damages other than lost wages and benefits related to her termination?

Answer: Yes or No _____

If your Answer to Question 3 is "Yes" in what amount? _____

42 U.S.C. § 1981 CLAIM

1. That Defendant Rogers, Defendant McMillan, and/or Defendant Elkins, in their official role as employees of the District, unlawfully impaired Plaintiff Cynthia Thomas' employment contract with the District on the basis of her race?

Answer: Yes or No _____

Note: If you answered "Yes" to Question 1, do you find:

2. That Plaintiff Cynthia Thomas should be awarded damages to compensate her for her lost wages and benefits from the date of her termination through the date of trial?

Answer: Yes or No _____

If your Answer to Question 2 is "Yes" in what amount do you advise that she be compensated for her lost wages and benefits? _____

3. That Plaintiff Cynthia Thomas should be awarded damages other than lost wages and benefits related to her termination?

Answer: Yes or No _____

If your Answer to Question 3 is "Yes" in what amount? _____

REINSTATEMENT/FRONT PAY

Note: Only answer these questions if you have found above that the District discriminated

and/or retaliated against Plaintiff Cynthia Thomas related to her termination.

1. Do you advise the Court that Plaintiff Cynthia Thomas should be reinstated as an employee in the District?

Answer: Yes or No _____

2. If the Court does not reinstate Plaintiff Cynthia Thomas, do you advise the Court that she should receive front pay?

Answer: Yes or No _____

If your answer to Question 2 _____

4/8/16
DATE

J

SIGNATURE OF FOREPERSON